



California Fair Political Practices Commission

July 14, 1987

Michael Anderson
The Council for Political
Responsiveness
2261 Market Street, Ste. 225
San Francisco, CA 94114-1693

Re: Your Request for Advice
Our File No. I-87-162

Dear Mr. Anderson:

You have requested advice concerning the disclosure provisions of the Political Reform Act.^{1/}

QUESTION

Is the Council for Political Responsiveness (CPR) required to file disclosure reports under the provisions of the Political Reform Act?

CONCLUSION

Based on the materials enclosed with your letter, it appears that CPR merely provides information about and encourages participation in the political process. If that is the case, CPR has no filing obligations under the Act. However, your letter provides no specific details about CPR's activities, and therefore it is not possible to provide you with a definite conclusion. The information contained in the analysis section of this letter should help you in determining whether CPR is required to file disclosure reports.

FACTS

According to the brochure enclosed with your letter, CPR is a non-partisan, non-profit community organization whose purpose is:

...to promote and support the principle that each citizen is equally responsible for voting on public issues, assisting in the development of governmental policy and maintaining the integrity of the persons in offices of authority.

^{1/}Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Administrative Code Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Administrative Code.

The brochure also states that CPR's specific programs include:

- Generating increased participation in public voting through media campaigns and special promotions.
- Providing the public with effective, concise, factual information on significant governmental actions and policy issues.
- Inception and continual augmentation of a public-servant-accountability-system that is easily accessible to the average person.
- Recording and publishing a model-system-manual for start-up and operation of similar organizations in other communities.
- Providing guidelines and activities for public access of the legislative body that most concerns them in order to help the public create positive change or input an effective voice in the process of policy-making.
- Promoting increased awareness in the significance of each person's vote and each person's correspondence to legislators on issues.

In addition to the brochure, you provided a "CPR Infosheet" of publications which are available to interested persons from state and federal government agencies as well as other politically active organizations.

ANALYSIS

As stated previously, your letter does not provide any specific details about CPR's activities and how it accomplishes its purposes. Therefore, I hope the following general information will help you to determine whether CPR's activities will create disclosure obligations under the Act.

The Act requires a membership organization like CPR to file campaign disclosure reports if it receives \$500 in campaign contributions during a calendar year. Membership dues are "contributions" to CPR if CPR uses them for the purpose of making contributions to or expenditures on behalf of state or local officeholders, candidates or committees. (Sections 82013(a), 84100-84217.) Enclosed is a copy of the 1987 "Information Manual on Campaign Disclosure Provisions of the Political Reform Act" which you should use to determine CPR's filing obligations if \$500 in a calendar year is spent to support or oppose officeholders, candidates or committees.

Michael Anderson
July 14, 1987
Page 3

In addition, organizations which employ a lobbyist or a lobbying firm for the purpose of attempting to influence state legislative or administrative actions incur filing obligations under the lobbying disclosure provisions of the Act. (Sections 86100-86300.) Organizations which do not employ a lobbyist or a lobbying firm, but which spend \$5,000 in a calendar quarter (other than campaign contributions) to influence state legislative or administrative actions also must file lobbying disclosure reports. (Section 86115.) Enclosed is a copy of the 1987 "Information Manual on Lobbying Disclosure Provisions of the Political Reform Act" which you should use to determine CPR'S filing obligations if money is being spent to influence legislative or administrative actions.

I hope the foregoing has been helpful. If you need further assistance with regard to CPR'S possible filing obligations, please do not hesitate to contact me at (916) 322-5662.

Sincerely,

Diane M. Griffiths
General Counsel

Carla J. Wardlow

By: Carla J. Wardlow
Political Reform Consultant

DMG:CJW:kmt

Enclosures

87-162
LUKE-DUDI
Civil Engineers, Inc.

**THE COUNCIL FOR POLITICAL
RESPONSIVENESS**

2261 Market Street
Suite 225
San Francisco, CA 94114-1693

Greg Luke, P.E.

Water & Wastewater Facilities • Water
Runoff Control • Water Quality Studies
Pavement Design • Computer S
Construction Inspection

605 Third Street Encinitas, CA 92024

June 12, 1987

A 87-162

Director
Executive/Legal Division
Fair Political Practices Commission
428 J Street, Suite 800
PO Box 807
Sacramento, CA 95814


Gentlemen:

We are writing to request an official Letter of Determination indicating whether our organization: CPR/qualifies as a "Political Committee" under your terms.

We would like to maintain a close and positive relationship with the FPPC in the future and wanted to confirm that our filings were in order.

Thank you.

Sincerely,


Michael Anderson
Administrative Associate
CPR

Review Materials Enclosed

MA/bb

3/87

CPR INFOSHEET

1

Publications:

Some of the following publications are available for free and some have a small mailing or printing fee. Write or call the publisher for details. Some of the publications may exhibit a certain bias. Please read objectively. CPR does not endorse any publication as a final source of information.

1. THE FREEDOM OF INFORMATION ACT. WHAT IT MEANS TO YOU. / CPR Publications, 2261 Market Street, SF, CA 94114-1693
2. THE SECRECY LOBBY, SAN FRANCISCO BAY GUARDIAN, VOL. 21, NO. 20, MAR. 4-11, 1987. / The Guardian Building, Back Issues, 2700 19th St., SF, CA 94110, (415) 824-7660
3. INFORMATION ABOUT COMMON CAUSE. / 2030 M Street, N.W., Washington, D.C., 20036
4. BAY AREA LAWYERS FOR THE ARTS, MULTIPLE PUBLICATIONS. / Fort Mason Center, San Francisco, CA, (415) 775-7200
5. CONFLICTS OF INTEREST AND CAMPAIGN CONTRIBUTIONS. / California Fair Political Practices Commission, (CFPPC), 428 J Street, (PO Box 807), Sacramento, CA 95804-0807 (916) 322-5662
6. POLITICAL REFORM ACT OF 1974 AS AMENDED-(CFPPC)
7. INFORMATION MANUAL FOR LOBBYING DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT. (CFPPC)
8. INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT. (CFPPC)
9. 1986 RECORD KEEPING MANUAL, CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT OF 1974. (CFPPC)
10. A GUIDE FOR CANDIDATES AND TREASURERS. (CFPPC)
11. CAMPAIGN GUIDE FOR NONCONNECTED COMMITTEES. / The Federal Election Commission, (FEC), Washington, D.C. 20463, (202) 376-5140
12. FEDERAL ELECTION CAMPAIGN LAWS. (FEC)
13. CODE OF FEDERAL REGULATIONS, FEDERAL ELECTIONS, 11, REVISED JAN. 1, 1986. / The National Archives of the United States, Superintendent of Documents, U.S. Government Printing Office, Wash., D.C., 20402, (202) 783-3238
14. WE, THE AMERICANS. / Consumer Information Center, (CIC) PO Box 100, Pueblo, Colorado, 81002, (303) 948-3334
15. FEDERAL DEPOSITORY LIBRARIES. (CIC)
16. YOUR RIGHT TO FEDERAL RECORDS. (CIC)
17. THE FIRST AMENDMENT HANDBOOK, / Reporters Committee for Freedom of the Press, 800 18th Street N.W., Suite 300, Wash. D.C., 20006, (202) 466-6313

18. THE FREEDOM OF INFORMATION ACT: WHAT IT IS AND HOW TO USE IT. / Freedom of Information Clearinghouse, PO Box 19367, Wash. D.C., 20036, (202) 293-9142
19. FREEDOM OF INFORMATION ACT FILES KIT, and other publications. / Fund for Open Information and Accountability, Inc., 145 West 4th Street, New York, N.Y., (212) 477-3188
20. OPEN MEETING LAWS. / Office of the Attorney General, Public Inquiries Unit, PO Box 944255, Sacramento, CA 94244-2550, (916) 332-3360
21. RAISING HELL. / The Center For Investigative Reporting, 54 Mint Street, San Francisco, CA, 94103, (415) 648-1000
22. CALIFORNIA FREEDOM OF INFORMATION COMMITTEE. / PO Box 900, Stockton, CA 95201, (209) 943-6397
23. CENTER FOR PUBLIC INTEREST LAW, resource brochures. / c/o Public Advocates, 1535 Mission Street, San Francisco, CA, 94103 (415) 431-7430
24. SAN FRANCISCANS FOR REASONABLE GROWTH, Information/membership brochure. / 870 Market Street, Suite 1117, San Francisco, CA, 94102, (415) 392-6760
25. VOTER REGISTRATION MATERIALS/ INFORMATION FLYER ON INITIATIVE PETITIONS. / Registrar of Voters, 155 City Hall, San Francisco, CA, 94102 (415) 554-4399
26. HOME AND BUSINESS COMPUTER ON-LINE INFORMATION ACCESS/ WESTERN UNION EASYLINK SYSTEM/ INFOMASTER DATABASE SERVICE/ Western Union Telegraph Co., One Lake Street 5-5, Upper Saddle River, NJ, 07458, (800) 435-7375
27. Government, Political and Public Interest Publications List for South End Press. / South End Press, Box 68, Astor Station, Boston, MA, 02123, (617) 266-0629
28. DIRECTORY OF SAN FRANCISCO CLUBS AND ORGANIZATIONS. / San Francisco Chamber of Commerce, 465 California Street, San Francisco, CA, 94104, (415) 392-4511
29. American Civil Liberties Union information brochure. / 1663 Mission St., 4th Flr., San Francisco, CA, 94103 (415) 621-2488
30. Citizens Action League information brochure. / 2988 Mission Street, San Francisco, CA, 94105, (415) 647-8450
31. San Francisco Planning & Urban Research Assn. information brochure. / 312 Sutter Street, San Francisco, CA, 94108, (415) 781-8726
32. The State Bar of California information brochures. / 555 Franklin St., San Francisco, CA, 94102, (415) 561-8200
33. Legal Aid Society information brochures. / 693 Mission Street, San Francisco, CA, 94103, (415) 495-7374
35. American Arbitration Assn. information brochure. / 445 Bush, 5th Flr., San Francisco, CA, 94108, (415) 981-3901

CPR
THE COUNCIL
FOR POLITICAL
RESPONSIVENESS

*A Citizens Organization For Ethics And
Accountability In Government.*

THE COUNCIL FOR POLITICAL RESPONSIVENESS
2261 Market Street
Suite 225
San Francisco, CA 94114-1693

SOME THOUGHTS...

A journey of a thousand miles begins with the first step.
— Old Turkish proverb

A government has something more to do than to govern, and levy taxes to pay the governors. It is something more than a police to arrest evil and punish wrong. It must also encourage good, point out improvements, open roads of prosperity and infuse life into all right enterprises. It should combine the best minds of the state for all the high ends for which society is established and to which man aspires. That gives us much to do. — Joshua Chamberlain

I am only one, but still I am one. I cannot do everything, but still I can do something; And because I cannot do everything, I will not refuse to do the something that I can do.
— Edward Everett Horton

Ye shall know the truth and the truth shall make you free.
— John 8:32 (Engraved in marble at CIA headquarters entrance)

In a gentle way, you can shake the world. — Mahatma Gandhi

There are no great (people) in this world only great challenges which ordinary (people) rise to meet. — Admiral Bill Halsey

Perhaps the most valuable result of all education is the ability to make yourself do the thing you have to do, when it has to be done, whether you like it or not. This is the first lesson to be learned. — Thomas Henry Huxley

The rights of children are worth fighting for, because children are our best known source of adults. — Shari Lewis

...patriotism is not so much protecting the land of our fathers as preserving the land of our children. — Jose Ortega y Gasset

Better light a candle than curse the darkness.
— Old Chinese proverb

Truth cannot be told so as to be understood without being believed. — William Blake

Ambition often puts men upon doing the meanest offices, so, climbing is performed in the same posture with creeping.
— Jonathan Swift

I believe that it is better to tell the truth than a lie. I believe it is better to be free than a slave. And I believe it is better to know than to be ignorant. — H. L. Mencken

Without rules there can be no game, without discipline there can be no freedom, and without responsibility there can be no rights. — Walter Hoving

This above all: to thine own self be true, And it must follow, as the night the day, Thou canst not then be false to any man.
— Shakespeare

HOW CAN YOU GET INVOLVED?

1. JOIN CPR:

NAME: _____

PHONE: _____

ADDRESS: _____

CITY: _____

STATE: _____ ZIP: _____

☐ \$10.00 SPECIAL MEMBER
ALL MEMBERSHIP CATEGORIES PLACE YOU ON OUR MAILING LIST FOR SPECIAL PROJECT INFORMATION AND CPR NEWS UPDATES.-

☐ \$40.00 AUXILIARY MEMBER

☐ \$150.00 SUPPORTING MEMBER

☐ \$_____ OPEN MEMBERSHIP

2. VOLUNTEER:

☐ I HAVE SPECIALIST SKILLS IN THE AREA OF _____
AND WOULD LIKE TO VOLUNTEER MY TIME.

☐ I USUALLY HAVE FREE TIME THE FOLLOWING DAYS
AND HOURS: _____
AND WOULD LIKE TO HELP WITH OFFICE AND ADMINISTRATIVE AID TASKS

3. FIND 10 PEOPLE, WHOM YOU KNOW, WHO ARE NOT REGISTERED VOTERS AND ASK THEM TO REGISTER. FOLLOW-UP WITH THEM AND HELP SEE THAT THEY DO.

4. INFORM YOURSELF, READ DIFFERENT VIEWPOINTS OF INFORMATION ON ISSUES THAT CONCERN YOU. MAKE SURE YOU HAVE ALL SIDES OF THE STORY.

5. WATCH CPR NEWS FOR NEW PROGRAMS AND PARTICIPATE WHEN YOU CAN.

6. USE THE CPR CONTACT BOOK TO WRITE OR PHONE POLITICAL REPRESENTATIVES AND EXPRESS YOUR FEELINGS ON ISSUES WHICH THEY CAN HELP TO FINALIZE IN POSITIVE LEGISLATION.

SEND YOUR MEMBERSHIP FEE AND THE TOP HALF OF THIS FORM TO:

THE COUNCIL FOR POLITICAL RESPONSIVENESS
2261 Market Street
Suite 225
San Francisco, CA 94114-1693

CPR is a non-partisan, non-profit community organization.